

Message

From: Lacey, Pam [PLacey@aga.org]
Sent: 7/11/2018 6:48:21 PM
To: Beeler, Cindy [Beeler.Cindy@epa.gov]
CC: Susan Schow (schow29@comcast.net) [schow29@comcast.net]; ona.papageorgiou@dec.ny.gov; timakirataylor@live.com [timothya.taylor@state.co.us]
Subject: RE: ITRC Methane Updates: METEC June Newsletter, American Geophysical Union Mtg, Surf/Turf Link, Revised Outreach PPT

Hi Cindy – I finally got a chance to dip into my OOOOa files this afternoon to check. Just shows I shouldn't try to answer this sort of thing on my phone while bouncing along on the Red Line Metro at the end of the day without my files! I think I was remembering the related (and eventually cancelled) gas ICR that included some LNG terminals and LNG peak shaving facilities.

I was also recalling the difficulty we all had in parsing the definition of compressor station and the somewhat murky responses we got in the Response to Comment document. But yes, it seems fugitives from compressor stations at LNG peak shaving aka storage is excluded if located outside the LDC custody transfer station (which is the usual case), and while some LNG operations at processing plants are included in the rule, processing plant compressor stations are excluded. The rule applies to transmission and storage generally. A terminal is not "storage," and it would not appear to be part of "transmission." Section 60.5430a defines "natural gas transmission" to include pipes, compressors etc. "used for transporting gas from a production plant, delivery point of purchased gas, gathering system, storage area, or other wholesale source of gas to one or more distribution area(s)." A terminal is a delivery point that feeds into a transmission line – usually an interstate pipeline.

I have not been involved in the Maryland rulemaking, since AGA doesn't delve into state proceedings usually. We leave that to the expertise and local knowledge of our member companies. So I'll ask BGE/Exelon or WGL for that slide deck. Sounds good, and certainly consistent with our information.

Thanks! - Pam

Pamela A. Lacey | Chief Regulatory Counsel

American Gas Association

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The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 70 million customers throughout the nation.

From: Beeler, Cindy [mailto:Beeler.Cindy@epa.gov]
Sent: Tuesday, July 10, 2018 6:30 PM
To: Lacey, Pam <PLacey@aga.org>
Cc: Susan Schow (schow29@comcast.net) <schow29@comcast.net>; ona.papageorgiou@dec.ny.gov; timakirataylor@live.com <timothya.taylor@state.co.us>
Subject: RE: ITRC Methane Updates: METEC June Newsletter, American Geophysical Union Mtg, Surf/Turf Link, Revised Outreach PPT

Pam – Thanks for the clarifications. Although, NSPS OOOO/OOOOa does not cover LNG terminals.

Trust you've been involved in Maryland's new proposed methane rules for Natural Gas Transmission & Storage. Their slide deck for stakeholders certainly paints an encouraging picture for natural gas role in improving air quality across the East – fine particles and ozone. Good news.

Cindy Beeler

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From: Lacey, Pam [<mailto:PLacey@aga.org>]**Sent:** Tuesday, July 10, 2018 4:24 PM

To: Susan Schow <schow29@comcast.net>; cesar.alfaro@bsee.gov; y.ariel@bluefield.co; j.atkinson@bluefield.co; dbacon@utah.gov; Barbery, Andrea <Barbery.Andrea@epa.gov>; clay.bell@colostate.edu; nabhatt@pa.gov; dburge@environcorp.com; anna.h.butler@usace.army.mil; lindsay.campbell@aer.ca; Chattopadhyay, Sandip <chattopadhyay.sandip@epa.gov>; achristensen@burnsmcd.com; bdeering@gesonline.com; steve@kairosaerospace.com; Dewees, Jason <Dewees.Jason@epa.gov>; don.dsouza@gov.bc.ca; roopa.ganapathy@canada.ca; ag5@azdeq.gov; mharrison2@satx.rr.com; Nicole Henderson <Nicole_henderson@sra.com>; jhegland@methanealliance.ca; jorn.herner@arb.ca.gov; ihers@golder.com; jjacobs@tcsd.us; james jarrett <james.f.jarrett@wv.gov>; yaomin.jin@gov.bc.ca; kelly.kaletsky@epa.ohio.gov; hisanori.kawashima@konicaminolta.com; mkhan@desu.edu; olga.b.k@hotmail.com; vivien.lecoustre@hq.doe.gov; dlyon@edf.org; amckittr@ida.org; ryou.minegishi@konicaminolta.com; irene.montero@bp.com; michael.murphy@deq.virginia.gov; craig.oneill@flir.com; ona.papageorgiou@dec.ny.gov; mpatil@langan.com; sreinis@langan.com; sdrichardson@gsi-net.com; j.rutherford@heathus.com; escheehl@arb.ca.gov; rscofield@gsi-net.com; sanjay.shah@dep.nj.gov; bashman@earthlink.net; dsPICUZZA@woodardcurran.com; ryan@kairosaerospace.com; skstuver@gsi-net.com; rsur@stanford.edu; timakirataylor@live.com <timothy.taylor@state.co.us>; Grant Trigger <gtrigger@racertrust.org>; erin.e.tullos@exxonmobil.com; zhongmaosheng@126.com; dan.zimmerle@colostate.edu; 'Molly Olonoff' <molonoff@ecos.org>; randy.chapman@deq.virginia.gov; gibjersey@gmail.com; ronald.mcmahan@sgs.com; Beeler, Cindy <Beeler.Cindy@epa.gov>

Subject: Re: ITRC Methane Updates: METEC June Newsletter, American Geophysical Union Mtg, Surf/Turf Link, Revised Outreach PPT

Hi Cindy - On the first bullet, the OOOOa methane NSPS covers the value chain upstream of the gas utility's custody transfer stations, so that also includes LNG terminals. On the second bullet - PHMSA regulates safety not just for transmission "pipelines" but also for compressor stations, underground storage facilities, LNG facilities, distribution mains and customer service lines, farm taps, metering and pressure regulating stations, and propane peak shaving facilities. I tried to short hand the list but didn't want to just say "pipeline safety" because folks might not realize what all that includes.

On the third bullet, yes that's right.

Thanks for reviewing - Pam

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From: Beeler, Cindy <Beeler.Cindy@epa.gov>**Sent:** Tuesday, July 10, 2018 5:55:31 PM

To: Lacey, Pam; Susan Schow; cesar.alfaro@bsee.gov; y.ariel@bluefield.co; j.atkinson@bluefield.co; dbacon@utah.gov; Barbery, Andrea; clay.bell@colostate.edu; nabhatt@pa.gov; dburge@environcorp.com; anna.h.butler@usace.army.mil; Lindsay.Campbell@aer.ca; Chattopadhyay, Sandip; achristensen@burnsmcd.com; bdeering@gesonline.com; steve@kairosaerospace.com; Dewees, Jason; don.dsouza@gov.bc.ca; roopa.ganapathy@canada.ca; ag5@azdeq.gov; mharrison2@satx.rr.com; Nicole Henderson; jhegland@methanealliance.ca; jorn.herner@arb.ca.gov; ihers@golder.com; jjacobs@tcsd.us; james jarrett; yaomin.jin@gov.bc.ca; kelly.kaletsky@epa.ohio.gov;

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Subject: RE: ITRC Methane Updates: METEC June Newsletter, American Geophysical Union Mtg, Surf/Turf Link, Revised Outreach PPT

I like the way Pam has differentiated between missions of federal regulators and PUCs along the natural gas supply chain. I've made a couple edits to see if I correctly understand the slide:

Regulation of Methane Emissions

- *For environmental protection, Federal agencies overseeing fugitive emissions or equipment leaks from production, processing, and transmission & storage facilities ~~O&G~~ include:*
 - Environmental Protection Agency (EPA),
 - Bureau of Land Management (BLM) of the Department of Interior,
- *For operational and public safety, PHMSA oversees pipelines natural gas systems (including leak surveys) from distribution, transmission, storage, and LNG:*
 - Pipeline and Hazardous Materials Safety Administration (PHMSA), of the Department of Transportation (with some delegation to states)
- *For safety and just and fair utility rates, State Public Utility Commissions also regulate leak surveys, infrastructure upgrades, and economic ratemaking related to natural gas distribution and, intrastate pipelines and storage facilities*

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From: Lacey, Pam [<mailto:PLacey@aga.org>]

Sent: Tuesday, July 10, 2018 3:00 PM

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Subject: RE: ITRC Methane Updates: METEC June Newsletter, American Geophysical Union Mtg, Surf/Turf Link, Revised Outreach PPT

All – Sorry I had to miss the call (to participate in an AGA webinar in the same time slot this afternoon). I noticed something got lost in translation on slide 15 regarding my suggested edits. Attached is my attempt to clarify slide 15 – let me know what you think. Also note that I did not include “gathering” on the list of what PHMSA regulates currently. PHMSA has a proposed rule to revise the regulations for transmission and to add rules for gathering, but it is not yet final and probably will not be final for several more months. If you would like to see PHMSA’s current pipeline safety regulations, see this link to 49 C.F.R. Chapter 1, Subchapter D - https://www.ecfr.gov/cgi-bin/text-idx?SID=b187f011091efbab7189abc3b6feebac&mc=true&tpl=/ecfrbrowse/Title49/49cfrv3_02.tpl#0 - skip to the pipeline safety rules beginning at Part 190.

Thanks for including the newsletter – it was great to see Clay’s wedding photo!

Best, Pam

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The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 70 million customers throughout the nation.

From: Susan Schow [<mailto:schow29@comcast.net>]

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Subject: ITRC Methane Updates: METEC June Newsletter, American Geophysical Union Mtg, Surf/Turf Link, Revised Outreach PPT

Methane Team Members

Please find the **revised Outreach PPT** as edited during today's Team call. Susan and Ona will incorporate these changes and re-issue to Team for final 2-week review on 7/27/2018.

See info below from Team Member, David Lyon, on **American Geophysical Union meeting in DC on December 10-14. Abstracts/ posters due August 1.**

Also see below and attached the **METEC Newsletter June 2018** from Tim Taylor. Congratulations to Team member, Clay Bell, who was very helpful to our efforts in Anaheim (pg 3)!

Also see below Jeff Short's article on **"Surf And Turf: To Reduce Gas Emissions From Cows, Scientists Look To The Ocean"**

<https://www.npr.org/sections/thesalt/2018/07/03/623645396/surf-and-turf-to-reduce-gas-emissions-from-cows-scientists-look-to-the-ocean>

Thanks to all for sharing the relevant info and stay in touch!
Susan

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ITRC Methane Team - Program Advisor
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From: David Lyon <dlyon@edf.org>
Sent: Tuesday, July 10, 2018 11:15 AM
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Cc: Taylor - CDPHE, Timothy (timothy.taylor@state.co.us) <timothy.taylor@state.co.us>; 'Papageorgiou, Ona P (DEC)' <ona.papageorgiou@dec.ny.gov>
Subject: RE: ITRC Methane Team – Conference Call

Susan, can I make a quick announcement about the American Geophysical Union meeting? It will be held in DC on December 10-14 and abstracts for talks or posters are due August 1 (and they are very firm about the deadline!). I'm helping organize two session on innovative leak detection: one focused on technologies and another on regulations.

Cheers,
David

Innovations in Methane Emissions Detection Technology
<https://agu.confex.com/agu/fm18/prelim.cgi/Session/51323>

Innovation and Regulation: Policies for Facilitating the Adoption of New Approaches to Mitigate Oil and Gas Emissions
<https://agu.confex.com/agu/fm18/prelim.cgi/Session/52482>

From: Timothy Taylor - CDPHE <timothy.taylor@state.co.us>
Sent: Monday, July 9, 2018 10:52 PM
To: Papageorgiou, Ona P (DEC) <ona.papageorgiou@dec.ny.gov>; Susan Schow <schow29@comcast.net>
Subject: Fwd: METEC Newsletter June 2018

Susan & Ona,

I can't remember if I shared this newsletter in the past but I think this one is worth passing on to the team particularly regarding CANGET, which will carry on the torch for equivalency evaluation of methane detection technologies (glad to see that is in motion).

Additionally, as noted in the newsletter, one of our newer team members, Clay Bell, recently got married and is headed off to France for a work project!

Tim

----- Forwarded message -----

From: Bennett, Kristine <Kristine.Bennett@colostate.edu>

Date: Thu, Jun 28, 2018 at 12:42 PM

Subject: METEC Newsletter June 2018

To: Bennett, Kristine <Kristine.Bennett@colostate.edu>

Hello All!

It's been 6 months since the last METEC Newsletter, and a lot has happened since then. I hope you enjoy catching up on what's new! We appreciate your continued interest in the METEC site at Colorado State University. Please, let me know if you have questions/concerns/comments.

Have a safe and happy 4th of July next week!

Kristine

If you know of others who might also like to receive this newsletter, please let me know! Alternatively, if you no longer wish to receive this, I can remove you from the mailing list – just reply back to me to request that.

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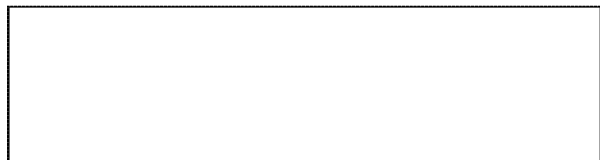
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From: Jeffrey Short <bashman@earthlink.net>

Sent: Wednesday, July 4, 2018 10:10 AM

To: 'Susan Schow' <schow29@comcast.net>

Subject: Surf and Turf

<https://www.npr.org/sections/thesalt/2018/07/03/623645396/surf-and-turf-to-reduce-gas-emissions-from-cows-scientists-look-to-the-ocean>

Also, for your Boston Baked Beans recipe--cooking beans in kelp (Kombu) helps them cook without brining and reduces gassiness in humans, too.